

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE:	§	
REMARKABLE HEALTHCARE OF	§	
CARROLLTON, LP <i>et al.</i>	§	Case No. 24-40605
Debtor(s).	§	EXPEDITED HEARING REQUESTED:
	§	

MOTION FOR EXPEDITED HEARING REGARDING:

- (1) THIRD MOTION TO (I) APPROVE INTO DEBTOR POSSESSION CREDIT AGREEMENT, (II) GRANT PRIMING LIENS UNDER CODE SEC. 364(D), AND (III) OBTAIN RELATED RELIEF (REGARDING APRIL 19, 2024 PAYROLL) (DOCKET NO. 187) AND**
- (2) FOURTH MOTION (I) APPROVE INTO DEBTOR POSSESSION CREDIT AGREEMENT, (II) GRANT PRIMING LIENS UNDER CODE SEC. 364(D), AND (III) OBTAIN RELATED RELIEF (REGARDING MAY 3, 2024 PAYROLL) (DOCKET NO. 188)**
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TO THE HONORABLE BRENDA T. RHOADES, U.S. BANKRUPTCY JUDGE:

KRS Dallas LLC, KRS Fort Worth LLC, KRS Fort Worth LLC, KRS Seguin LLC, and Kilgore Property Management LLC (collectively, “Kilgore”) this *Motion for Emergency Hearing* and in support thereof would show the Court the following.

1. **Underlying motions.** The above-caption DIP financing motions, Docket Nos. 187-188.
2. **Basis for expedited consideration.** Kilgore seeks final orders to protect the lender, Kilgore, for the payroll funds advanced to the Debtors on March 22, 2024 and then again on April 5, 2024, in connection with the approaching, final disposition of these cases.
3. **Certificate of Conference.** Not applicable under the circumstances.
4. **Time estimate for hearing.** Thirty (30) minutes or less.
5. **Deadline for when hearing is needed:** A hearing should occur on or soon after

July 15, 2024

6. A proposed form of order accompanies this motion.

Dated: July 2, 2024

Respectfully submitted:

WEYCER, KAPLAN, PULASKI & ZUBER, P.C.

By: /s/ Jeff Carruth

JEFF CARRUTH (TX SBN:. 24001846)

3030 Matlock Rd., Suite 201

Arlington, Texas 76105

Telephone: (713) 341-1158

E-mail: jcarruth@wkpz.com

ATTORNEYS FOR

KRS CARROLLTON LLC, KRS DALLAS LLC,

KRS SEGUIN, LLC, KRS FORT WORTH LLC,

AND KILGORE PROPERTY MANAGEMENT LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on July 2, 2024 (1) by electronic notice to all ECF users who have appeared in this case to date (2) by regular mail to all parties appearing in the attached address list (i.e. mailing matrix) obtained from the Court's PACER facility.

/s/ Jeff Carruth

JEFF CARRUTH

ECF NOTICE LIST

24-40605 Notice will be electronically mailed to:

Elizabeth Nicolle Boydston on behalf of Debtor Remarkable Healthcare of Carrollton, LP
lboydston@gutnicki.com

Elizabeth Nicolle Boydston on behalf of Debtor Remarkable Healthcare of Dallas, LP
lboydston@gutnicki.com

Elizabeth Nicolle Boydston on behalf of Debtor Remarkable Healthcare of Fort Worth, LP
lboydston@gutnicki.com

Elizabeth Nicolle Boydston on behalf of Debtor Remarkable Healthcare of Seguin, LP
lboydston@gutnicki.com

Elizabeth Nicolle Boydston on behalf of Debtor Remarkable Healthcare, LLC
lboydston@gutnicki.com

Lynn Hamilton Butler on behalf of Creditor Alleon Capital Partners, LLC
lynn.butler@huschblackwell.com,
penny.keller@huschblackwell.com; christine.deacon@huschblackwell.com; ryan.burgett@huschblackwell.com

Jeff Carruth on behalf of Creditor KRS Carrollton, LLC
jcarruth@wkpz.com,
jcarruth@aol.com; atty_carruth@trustesolutions.com; ATTY_CARRUTH@bluestylus.com;
m;carruthjr87698@notify.bestcase.com

Jeff Carruth on behalf of Creditor KRS Dallas, LLC
jcarruth@wkpz.com,
jcarruth@aol.com; atty_carruth@trustesolutions.com; ATTY_CARRUTH@bluestylus.com;
m;carruthjr87698@notify.bestcase.com

Jeff Carruth on behalf of Creditor KRS Fort Worth, LLC
jcarruth@wkpz.com,
jcarruth@aol.com; atty_carruth@trustesolutions.com; ATTY_CARRUTH@bluestylus.com;
m;carruthjr87698@notify.bestcase.com

Jeff Carruth on behalf of Creditor KRS Seguin, LLC
jcarruth@wkpz.com,
jcarruth@aol.com; atty_carruth@trustesolutions.com; ATTY_CARRUTH@bluestylus.com;
m;carruthjr87698@notify.bestcase.com

Jeff Carruth on behalf of Creditor Kilgore Property Management LLC
jcarruth@wkpz.com,
jcarruth@aol.com; atty_carruth@trustesolutions.com; ATTY_CARRUTH@bluestylus.com;
m;carruthjr87698@notify.bestcase.com

Alejandra Garcia Castro on behalf of Creditor Alleon Capital Partners, LLC
alejandra.garciacastro@huschblackwell.com

Buffey E. Klein on behalf of Creditor Alleon Capital Partners, LLC
buffey.klein@huschblackwell.com, tanya.adams@huschblackwell.com; buffey-klein-8494@ecf.pacerpro.com

Aimee E. Marcotte on behalf of Creditor A Lawn and Landcare Services Company, LLC
amarcotte@popehardwicke.com

Christopher S. Murphy on behalf of Interested Party Texas Health and Human Services Commission
bk-cmurphy@oag.texas.gov, sherri.simpson@oag.texas.gov

Julie Anne Parsons on behalf of Creditor The County of Denton, Texas
jparsons@mvbalaw.com,
kalexander@mvbalaw.com; theresa.king@mvbalaw.com; julie.parsons@ecf.courtdrive.com

Julie Anne Parsons on behalf of Creditor The County of Guadalupe, Texas
jparsons@mvbalaw.com,
kalexander@mvbalaw.com; theresa.king@mvbalaw.com; julie.parsons@ecf.courtdrive.com

Harrison Pavlasek on behalf of Creditor Quatro Tax LLC
hpavlasek@forsheyprostok.com

Jeff P. Prostok on behalf of Creditor Quatro Tax LLC
jprostok@forsheyprostok.com,
lbreedlove@forsheyprostok.com; calendar@forsheyprostok.com; Calendar_0573@ecf.courtdrive.com; jprostok@ecf.courtdrive.com; khartogh@ecf.courtdrive.com; khartogh@forsheyprostok.com; forsheyprostokllp@jubileebk.net

Alexandria Rahn on behalf of Debtor Remarkable Healthcare of Carrollton, LP
arahn@gutnicki.com, docket@gutnicki.com; 1694884420@filings.docketbird.com

Alexandria Rahn on behalf of Debtor Remarkable Healthcare of Dallas, LP
arahn@gutnicki.com, docket@gutnicki.com; 1694884420@filings.docketbird.com

Alexandria Rahn on behalf of Debtor Remarkable Healthcare of Fort Worth, LP
arahn@gutnicki.com, docket@gutnicki.com; 1694884420@filings.docketbird.com

Alexandria Rahn on behalf of Debtor Remarkable Healthcare of Seguin, LP
arahn@gutnicki.com, docket@gutnicki.com; 1694884420@filings.docketbird.com

Alexandria Rahn on behalf of Debtor Remarkable Healthcare, LLC
arahn@gutnicki.com, docket@gutnicki.com; 1694884420@filings.docketbird.com

Robert A. Simon on behalf of Creditor MedixCar LLC
rsimon@whitakerchalk.com, bpeck@whitakerchalk.com; acopeland@whitakerchalk.com

Whitney Tharpe on behalf of Creditor United States Department of Health and Human Services
whitney.tharpe@usdoj.gov, guadalupe.garcia@usdoj.gov

John Kendrick Turner on behalf of Creditor City of Carrollton
john.turner@lgbs.com, Dora.Casiano-Perez@lgbs.com; Dallas.Bankruptcy@lgbs.com

John Kendrick Turner on behalf of Creditor Dallas County
john.turner@lgbs.com, Dora.Casiano-Perez@lgbs.com; Dallas.Bankruptcy@lgbs.com

John Kendrick Turner on behalf of Creditor Lewisville ISD
john.turner@lgbs.com, Dora.Casiano-Perez@lgbs.com; Dallas.Bankruptcy@lgbs.com

John Kendrick Turner on behalf of Creditor Tarrant County
john.turner@lgbs.com, Dora.Casiano-Perez@lgbs.com; Dallas.Bankruptcy@lgbs.com

John M. Vardeman on behalf of U.S. Trustee US Trustee
john.m.vardeman@usdoj.gov

Mark A WEISBART (SBRA V)
mweisbart@haywardfirm.com,
tsimmons@haywardfirm.com; ecf.alert+Weisbart@titlexi.com

REGULAR MAIL LIST / MATRIX

Label Matrix for local noticing 0540-4 Case 24-40605 Eastern District of Texas Sherman Mon Apr 15 21:07:52 CDT 2024 71 Concepts LLC Kenneth Hilton 2150 W Northwest Why, Ste 114 Grapevine, TX 76051-7849	1-A Fire & Domestic Testing Brian Wagoner 126 County Road 4577 Boyd, TX 76023-4452 A Lawn and Landcare Services Company, LLC 500 W. 7th Street , TX 76102-4721	1-A Services Plumbing and HVAC 126 County Rd 4577 Boyd, TX 76023-4452 A&K Mastertech Inc. 3913 Long Hollow Rd Roanoke, TX 76262-3831
A-1 Grease Services, Inc. Melanie or Umberto P.O. Box 2097 Red Oak, TX 75154-1571	A-1 Tri-County Plumbing, Inc 101 Ermel Sequin, TX 78155-5965	Al Image PO Box 833691 Richardson, TX 75083-3691
ABC Home & Commercial Services 997 Grandys Lane Lewisville, TX 75077-2507	ABC Home & Commercial Services (Sequin) 9475 E. Highway 290 Austin, TX 78724-2303	(p)ACADIAN AMBULANCE SERVICE INC ATTN JESSE PROCTOR P O BOX 98000 LAFAYETTE LA 70509-8000
ACECO LLC PO Box 773 Granbury, TX 76048-0773	ADP, Inc. P.O. Box 842875 Boston, MA 02284-2875	AEDUSA PO Box 471880 Fort Worth, TX 76147-1880
AMI Service 614 C S Business IH 35 New Braunfels, TX 78130-4748	AT&T PO Box 5019 Carol Stream, IL 60197-5019	AT&T Mobility AT&T Business PO Box 6463 Carol Stream, IL 60197-6463
ATMOS ENERGY CORPORATION ATTN: BANKRUPTCY GROUP PO BOX 650205 DALLAS, TX 75265-0205	Aashka Medical Group 4001 Saint Johns Circle Carrollton, TX 75010-4238	Abshire Dietary Consultants P.O. Box 1635 El Campo, TX 77437-1635
Acadia Marketing & Consulting Paul Morgan 909 Corbett Drive Norman, OK 73072-3727	Advanced Mobility Systems of Texas Braun 2110 North Beach St Fort Worth, TX 76111-6812	Affordable Dentures & Implants - Denton 2318 San Jacinto Blvd Denton, TX 76205-7535
Aflac Worldwide Headquarters Attn Remittance Processing Services 1932 Wynnton Road Columbus, GA 31999-0001	Alco Sales & Service Co. 6851 High Grove Blvd Burridge, IL 60527-9725	Aldinger Chad Guthrie 1440 Prudential Dr Dallas, TX 75235-4110
All Needz Plumbing 2705 Saint Louis Ave Fort Worth, TX 76110-3343	Allegiance Ambulance PO Box 4320 Houston, TX 77210-4320	Alleon Capital Partners LLC c/o Buffey E. Klein Husch Blackwell LLP 1900 N. Pearl Street, Suite 1800 Dallas, TX 75201-2467

Alliance Insurance Partners
941 Oak St
Eugene, OR 97401-3105

Alliant Insurance Services Houston LLC
PO Box 840919
Dallas, TX 75284-0919

Allscripts
24630 Network Place
Chicago, IL 60673-1246

American Commercial Equipment Co LLC
P.O. Box 773
Granbury, TX 76048-0773

American Diagnostic Services
PO Box 62510
Baltimore, MD 21264-2510

American Express
P.O. Box 36001
Fort Lauderdale, FL 33336-0001

American Express National Bank
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

American Scale Company
3872 SH 64 W Suite 301
Tyler, TX 75704

Amerita Inc
2101 Donley Dr
Austin, TX 78758-4512

Area Metropolitan Ambulance Authority
d.b.a. MedStar
2900 Alta Mere Drive
Fort Worth, TX 76116-4115

Argee Mechanical, LLC
3831 FM 2181 Suite 106
Corinth, TX 76210-4205

Atmos Energy
P.O. Box 790311
St. Louis, MO 63179-0311

Attis Healthcare LLC
12540 Broadwell Rd.
Milton, GA 30004-6406

Aurous International
60 Walnut Ave
Clark, NJ 07066-1649

Auto-Chlor
P.O. Box 669126
Dallas, TX 75266-9126

Beard, Kultgen, Brophy
Bostwick&Dickerson
220 South 4th Street Waco, TX 76701-2225

BioSTAT
4841 Keller Springs Rd
Addison, TX 75001-5912

BioStat Imaging, LLC
Ronna Brooks
4841 Keller Springs Rd
Addison, TX 75001-5912

Biomedical Waste Solutions
PO Box 1147
Port Neches, TX 77651-1147

Blackall Mechanical Inc.
3724 Arapaho Rd
Addison, TX 75001-4311

Blue Cross Blue Shield of Texas
PO Box 731428
Dallas, TX 75373-1428

Blue Cross Blue Shield of Texas
Health Care Service Corporation
P.O. Box 731428
Dallas, TX 75373-1428

Elizabeth Nicolle Boydston
Gutnicki LLP
10440 North Central Expressway
Suite 800
Dallas, TX 75231-2264

Brisk Mechanical Services LLC.
7708 Pinehurst Dr. West
Fort Worth, TX 76134-4411

Buckeye Cleaning Centers
PO Box 840002
Kansas City, MO 64184-0002

Lynn Hamilton Butler
Husch Blackwell LLP
111 Congress Ave.
Ste 1400
Austin, TX 78701-4093

C & L Refrigeration
P.O. Box 2319
Brea, CA 92822-2319

C&B Lawn Care - Chris Sedberry
Chris Sedberry
512 Bent Oak Drive
Fort Worth, TX 76131-4228

CMS Corridor Mobile Medical Services
PO Box 643
San Marcos, TX 78667-0643

CMS Mechanical Services, Inc.
Erica Pace
5000 Energy Place Bldg 100
Denton, TX 76207-3527

CNA Surety
CNA Surety Direct Bill
PO Box 957312
St Louis, MO 63195-7312

CPro Associates Inc.
15660 N Dallas Parkway
Dallas, TX 75248-3348

Calderon Textiles
PO Box 1627
Indianapolis, IN 46206-1627

Cantwell Power Solutions, LLC
6413 Midway Rd suite
Haltom City, TX 76117-5302

Care One Communications LLC
Fernando Munoz
PO Box 153122
Dallas, TX 75315-3122

Care Trips LLC
1616 Gateway Blvd., Suite B
Richardson, TX 75080-3529

Care Trips, LLC
c/o Amber Welock, Welock Law, PC
13155 Noel Road, Suite 900
Dallas, TX 75240-6882

CareFlite
3110 S Great Southwest Parkway
Grand Prairie, TX 75052-7238

CareNow (GA)
PO Box 743571
Atlanta, GA 30374-3571

Carenow Corporate
P.O. Box 9101
Coppell, TX 75019-9494

Jeff Carruth
Weycer Kaplan Pulaski & Zuber, P.C.
2608 Hibernia, Suite 105
Dallas, TX 75204-2514

Check Mate Service Line
PO Box 41582
Providence, RI 02940-1582

Choice Clinical Laboratory INC
2329 West Parker Road
Carrollton, TX 75010-4713

City Ambulance Service
PO Box 691067
Houston, TX 77269-1067

City Of Carrollton
Linebarger Goggan Blair & Sampson, LLP
c/o John Kendrick Turner
2777 N. Stemmons Freeway
Suite 1000
Dallas, TX 75207-2328

City Of Carrollton
c/o John Kendrick Turner
Linebarger Goggan Blair & Sampson, LLP
2777 N. Stemmons Freeway Suite 1000
Dallas, TX 75207-2328

City of Carrollton
Linebarger Goggan Blair & Sampson, LLP
c/o John Kendrick Turner
2777 N. Stemmons Freeway
Dallas, TX 75207-2277

City of Carrollton
PO Box 115120
Carrollton, TX 75011-5120

City of Carrollton - Fire Permit
1945 E Jackson Road
Carrollton, TX 75006-1737

City of Carrollton -Alarm Permit
Alarm Permit
Dallas, TX 75222-4863

City of Carrollton Environmental Serv.
Environmental Services
P.O. Box 115125
Carrollton, TX 75011-5125

City of Carrollton Environmental Services
1945 E Jackson Road
Carrollton, TX 75006-1737

City of Seguin
PO Box 591
Seguin, TX 78156-0591

Colleyville Lofts Venture LLC
Attn: Accounting
Dallas, TX 75201

Colonial Life
Premium Processing
P.O. Box 903
Columbia, SC 29202-0903

Compass Wheelchair Transports
Carrie Wayes
385 CR 3060
Bonham, TX 75418-7306

Complete ERC
3348 Darvany Drive
Dallas, TX 75220-1616

Complete Supply, Inc.
1624 W Crosby St Suite 144
Carrollton, TX 75006-6676

Core Transit South
PO Box 541355
Grand Prairie, TX 75054-1355

Cornerstone Gardens LLP
PO Box 9005
Addison, TX 75001-9005

Cotton Commercial USA, Inc
Cotton Commercial USA Deposit Collection
PO Box 676549
Dallas, TX 75267-6549

Cotton Commercial USA, Inc.
PO Box 676549
Dallas, TX 75267-6549

Cotton Commercial USA, Inc.
840 W. Sam Houston Parkway N., Suite 225
Houston, TX 77024-4639

Crest Healthcare Supply
PO Box 727
Dassel, MN 55325-0727

Crown Shields Transport, LLC
Victor
11617 Lake Front Drive
Frisco, TX 75036-7693

Crystal & Company
32 Old Slip, 18th Floor
New York, NY 10005

DLE Plumbing Services
3738 FM 467
Seguin, TX 78155-0876

DNA Plumbing Services Ft. Worth
3807 Parchman Street
North Richland Hills, TX 76180-8853

Dallas County
Linebarger, Goggan, Blair & Sampson, LLP
c/o John K. Turner
2777 N. Stemmons Freeway
Suite 1000
Dallas, TX 75207-2328

Dallas Life Support Systems Inc.
7440 Whitehall St.
Richland Hills, TX 76118-6426

Dallas Medical Center
PO Box 678621
Dallas, TX 75267-8621

Dallas Tap Dazzlers
Candy Kelley
756 Marlee Circle
Coppell, TX 75019-5212

Dalworth Restoration
12750 S Pipeline Rd
Euless, TX 76040-5248

Danny Skaggs Company Inc. dba Pharmacy Unlim
12801 Wetmore Rd
San Antonio, TX 78247-3628

Dans Electronics
4945 Reynolda Rd
Winston-Salem, NC 27106-9643

Denton County Tax Office
Mary and Jim Horn Government Center
1505 E. McKinney Street
Denton, TX 76209-4525

Desmonds Elite Estimating and Restorat
2315 Brookview Dr
McKinney, TX 75072-3845

Diagnostex Consultants
8913 Mid Cities Blvd
North Richland Hills, TX 76182-4912

Diagnostic Image Plus
3022 Motley Drive
Mesquite, TX 75150-3440

Diagnostic Laboratories & Radiology
2820 N Ontario Street
Burbank, CA 91504-2015

Digital Verdict, Inc.
901 Main Street
Dallas, TX 75202-3711

Direct Energy Business
PO Box 660749
Dallas, TX 75266-0749

Direct Energy Business, LLC
c/o Nicholas R. Lawson, McDowell Hetheri
1001 Fannin St., Ste. 2400
Houston, TX 77002-6706

Direct Service Air & Plumbing LLC
PO Box 3060
Waxahachie, TX 75168-3060

Direct Supply, Inc.
Box 88201
Milwaukee, WI 53288-0201

Dr. Vaqar Dar
5625 Champions Dr.
Plano, TX 75093-4229

ENGIE Resources LLC
c/o Matthew W. Bourda, McDowell Hetherin
1001 Fannin Street, Suite 2400
Houston, TX 77002-6706

Elite Document Technology
400 N. Saint Paul St.
Dallas, TX 75201-6881

Elliot Greenleaf P.C.
925 Harvest Drive
Blue Bell, PA 19422-1956

Elliot Greenleaf, P.C.
Attn: John P. Elliot
925 Harvest Drive, Suite 300
Blue Bell, PA 19422-1956

Engie Resources
PO Box 841680
Dallas, TX 75284-1680

Environmental Services Department
1945 E. Jackson Rd
Carrollton, TX 75006-1737

Ewald Commercial Kitchen Repair
P.O. Box 311
Seguin, TX 78156-0311

Exceeds Construction
6724 Marvin Brown St
Fort Worth, TX 76179-3340

Exponent Technologies, Inc.
4970 Landmark Place
Dallas, TX 75254-6905

FPC Office Solutions
Joe
2035 Royal Lane, Suite 202
Dallas, TX 75229-7205

Farmer Brothers
P.O. Box 732855
Dallas, TX 75373-2855

Firestone (Credit First)
PO Box 81344
Cleveland, OH 44188-0001

Firetrol Protection Systems Inc
105 Windy Meadows Dr
Schertz, TX 78154-1361

Antonio A. Flores
214 North Camp Street
Seguin, TX 78155-5631

Fort Worth Internal Medicine
650 St. Louis Ave.
Fort Worth, TX 76104-3346

Frontier
PO Box 740407
Cincinnati, OH 45274-0474

Frontier Communications 1215
P.O. Box 740407
Cincinnati, OH 45274-0407

Alejandra Garcia Castro
Husch Blackwell LLP
1900 N. Pearl Street
Ste 1800
Dallas, TX 75201-2467

Glass Doctor Special Operations
2001 Midway Road
Carrollton, TX 75006-4959

Goodman Air Conditioning & Heating
1600 Clovis Barker Road, Suite 301
San Marcos, TX 78666-5392

Gorman Mechanical
1624 SE Parkway
Azle, TX 76020-3923

Grainger
Dept 880129333
Kansas City, MO 64141

Green Light Group, LLC
13821 Diplomat Drive
Farmers Branch, TX 75234-8813

Green Mountain Energy Dept 1233
P.O. Box 121233
Dallas, TX 75312-1233

Griffin Financial Group LLC
620 Freedom Business Center
King Of Prussia, PA 19406-1330

Guadalupe Regional Medical Center
1215 E. Court Street
Seguin, TX 78155-5129

HD Supply
Alexis Winkelhorst
PO Box 509058
San Diego, CA 92150-9058

Hagar Restaurant Service LLC
6200 N. W. 2nd St
Oklahoma City, OK 73127-6520

Haigood & Campbell
9911 E Bankhead Hwy
Aledo, TX 76008-2627

Harvest Fresh Juice, LLC
P.O. Box 239
Hallsville, TX 75650-0239

HealthDrive Podiatry and Dental Group
100 Crossing Blvd
Framingham, MA 01702-5555

Healthline Medical Equipment Inc
PO Box 4847
Wichita Falls, TX 76308-0847

Heritage Food Service Group Inc.
5130 Executive Blvd
Fort Wayne, IN 46808-1149

Hill-Rom Company Inc
PO Box 643592
Pittsburgh, PA 15264-3592

Hobart Service
5407 Bandera Rd
San Antonio, TX 78238-1980

Homelink Corporations
2300 North Barrington Rd
Hoffman Estates, IL 60169-2082

Husch Blackwell Law
111 Congress Avenue
Austin, TX 78701-4050

IDCSERVCO Business Services
Andrew
2034 Contner Ave, 1st Floor
Los Angeles, CA 90025-5668

(p)IPFS CORPORATION
30 MONTGOMERY STREET
SUITE 1000
JERSEY CITY NJ 07302-3836

ISOLVED Benefit Services
Attn Finance
PO Box 889
Coldwater, MI 49036-0889

Ida Butler Marshall
503 Haymeadow Dr
Wylie, TX 75098-4582

Infinity Mechanical Services LLC
702 Ascot Park Dr.
Mansfield, TX 76063-5478

Integrated Voice Systems
PO Box 33
Royse City, TX 75189-0033

Internal Revenue Service
1100 Commerce Street
MC5026 DAL
Dallas, TX 75242

Internal Revenue Service
Centralized Insolvency Operation
P.O. Box 7346
Philadelphia, PA 19101-7346

Interstate Restoration, LLC
PO Box 734756
Chicago, IL 60673-4756

Intrepid Technologies, Inc.
PO Box 55145
Little Rock, AR 72215-5145

Iron Mountain INC
PO Box 915004
Dallas, TX 75391-5004

JE Systems, Inc.
P.O. Box 6246
Fort Smith, AR 72906-6246

JJJNEMT LLC
Jacky Jean-Julien
1741 Cross Creek Lane
Cleburne, TX 76033-1217

JM Electronic Engineering, Inc.
P.O. Box 397
Round Rock, TX 78680-0397

JRGoodwyn Building Services
2801 Beverly Drive
Denton, TX 76209-4775

Janicek Law Firm PC
1100 NE Loop 410
San Antonio, TX 78209-1569

Joe s Plumbing Service
901 Chestnut Ln
Saginaw, TX 76179-0975

Joshuas Respiratory Care, Inc
1880 Shiloh Rd
Dallas, TX 75228

Joyce Mallory
Sorrels Law
c/o Randall Sorrels & Tom Omondi
5300 Memorial Drive, Suite 270
Houston, TX 77007-8250

KC Electric Systems
3333 Earhart Dr
Carrollton, TX 75006-5095

KCI USA
P.O. Box 301557
Dallas, TX 75303-1557

KG Services
PO Box 791
Haslet, TX 76052-0791

KRS CARROLLTON, LLC
c/o Jeff Carruth
Weycer, Kaplan et al.
2608 Hibernia, Suite 105
Dallas, TX 75204-2514

Kaliber Data Security & Compliance
50 Franklin Street
Boston, MA 02110-1306

Karcher North America
DEPT CH 19244
Palatine, IL 60055-0001

Kirby Restaurant & Chemical Supply
809 S Eastman Road
Longview, TX 75602-2303

Kirby Restaurant & Chemical Supply
809 South Eastman Road
Longview, TX 75602-2303

Buffey E. Klein
Husch Blackwell
1900 N. Pearl Street
Suite 1800
Dallas, TX 75201-2467

Knight Office Solutions, Inc
12961 Park Central, Suite 1470
San Antonio, TX 78216-2092

Landmark Healthcare
Attn Michael Everage
3515 NW Jim Wright Freeway
Fort Worth, TX 76106-3200

Lawn & Landcare
515 N. Kealy Avenue
Lewisville, TX 75057-3129

Lawn Pros, LLC
P.O. Box 1213
Colleyville, TX 76034-1213

Lawns by the Yard
PO Box 311125
New Braunfels, TX 78131-1125

Lewisville ISD
Linebarger Goggan Blair & Sampson, LLP
c/o John K. Turner
2777 N. Stemmons Fwy, Ste. 1000
Dallas, TX 75207-2328

Lewisville ISD
Linebarger Goggan Blair & Sampson, LLP
c/o John Kendrick Turner
2777 N. Stemmons Freeway
Suite 1000
Dallas, TX 75207-2328

Life Cycle Dental
6618 Fossil Bluff Drive
Fort Worth, TX 76137-7533

LifeLine EMS
Carrie Naves
385 CR 3060
Bonham, TX 75418-7306

Liquid Environmental Solutions
PO Box 733372
Dallas, TX 75373-3372

Lola Lorena Ltd. Co.
2016 Glenco Terrace
Fort Worth, TX 76110-1704

Lolita London
5168 Reed Dr
The Colony, TX 75056-1213

Lone Star Fire & First Aid
449 Culebra Road
San Antonio, TX 78201-6418

Loose Screws, LLC
1547 Tiffany Court
Grapevine, TX 76051-6600

(p)MIRANDA M WILLIAMS LLC
ATTN MIRANDA M WILLIAMS
7613 PROVIDENCE DR
ROWLETT TX 75089-3905

Thomas A. Mackey
2883 Palomino Springs
Bandera, TX 78003-3591

Manage Meds LLC
P.O. Box 377
Mason, OH 45040-0377

Manage Meds, LLC
29924 Network Place
Chicago, IL 60673-1299

Management and Network Services
6500 Emerald Parkway
Dublin, OH 43016-7460

Manuel & Sons A/C
10802 Hillpoint
San Antonio, TX 78217-2866

Aimee E. Marcotte
Pope Hardwicke Christie Schell Kelly & T
500 W. 7th St., Suite 600, Fort Worth, T
Fort Worth, TX 76102-4995

Markham Restaurant Supply Co., Inc.
420 South Fresno Street
Fort Smith, AR 72916-8005

Marshall Shredding
Co. Rob Greenfield
PO Box 91139
San Antonio, TX 78209-9096

Mas Vida Health Care Solutions
133 Nursery Ln
Fort Worth, TX 76114-4334

MassMutual Financial Group
P.O. Box 371368
Pittsburgh, PA 15250-7368

Massoud Furniture
8351 Moberly Lane
Dallas, TX 75227-2316

Med-Pass Inc.
L-3495
Columbus, OH 43260-0001

Medical Equipment Services, Inc.
P.O. Box 157
Holly Springs, NC 27540-0157

Medical Transportation Solutions
Samuel Alexander
2033 Jack County Road
Forney, TX 75126-5149

Medina Valley Security, Inc.
Brad or Nikki
PO Box 1030
Lytle, TX 78052-1030

MedixCar LLC
7309 Big Bend Ct.
Fort Worth, TX 76137-4448

MedixCar, LLC
c/o Robert A. Simon, Whitaker Chalk
301 Commerce Street, Suite 3500
Fort Worth, TX 76102-4135

Medixcar, LLC
c/o Robert A. Simon
Whitaker Chalk Swindle & Schwartz PLLC
301 Commerce Street, Suite 3500
Fort Worth, TX 76102-4135

(p)MEDLINE INDUSTRIES INC
ATTN ANNE KISHA
ONE MEDLINE PL
MUNDELEIN IL 60060-4486

Medline Industries, Inc.
Dept 1080
Dallas, TX 75312-0001

Michael Lynch & Associates, Inc.
911 NW Loop 281
Longview, TX 75604-2900

(p)MID SOUTH FIRE SOLUTIONS LLC
669 AERO DRIVE
SHREVEPORT LA 71107-6653

Mid-South Fire Solutions, LLC
Jada Rabin
669 Aero Drive
Shreveport, LA 71107-6943

Montgomery Capital Advisers LLC
2500 Dallas Parkway
Plano, TX 75093-4867

Montgomery Coscia Greilich, LLP
2500 Dallas Parkway
Plano, TX 75093-4872

More Power Vent Cleaning
P.O. Box 8141
Fort Worth, TX 76124-0141

Mountain Electronics Inc
621 Micaville Loop
Burnsville, NC 28714-0829

Christopher S. Murphy
Texas Attorney General's Office
PO Box 12548
Austin, TX 78711-2548

(p)NORTH TEXAS FIRE SYSTEMS LLC
PO BOX 880
SANGER TX 76266-0880

NTTA North Texas Tollway Authority
P.O. Box 660244
Dallas, TX 75266-0244

National Seating & Mobility Inc.
2211 Denton Dr
Austin, TX 78758-4532

Netsmart Technologies, Inc.
PO Box 713519
Philadelphia, PA 19171-3519

New Benefits Ltd.
PO Box 803475
Dallas, TX 75380-3475

New Source Medical
9913 Shelbyville Road
Louisville, KY 40223-2904

New Source Medical
9913 Shelbyville Rd
Louisville, KY 40223-2904

North American Administrators
1826 Elm Hill Pike
Nashville, TN 37210-3710

Northwest Engravers
3300 Cherry Lane
Fort Worth, TX 76116-6405

O.G. Motor Garage
Walter O. Serrano
2244 Larson Lane
Dallas, TX 75229-2042

Occupational Health Solutions
PO Box 12089
Fort Worth, TX 76110-8089

Office of the Attorney General
Main Justice Building, Room 5111
10th & Constitution Avenue, NW
Washington, DC 20530-0001

Office of the United States Attorney
1100 Commerce Street, 3rd Floor
Dallas, TX 75242-1074

One Hour Air Conditioning and Heating
2535 Brennan Avenue
Fort Worth, TX 76106-8408

Optima Healthcare Solutions, LLC.
Net Health Systems, Inc
PO Box 72046
Cleveland, OH 44192-0002

Orkin
3330 Keller Springs RD
Carrollton, TX 75006-5053

OshakaCare Solutions
Sunkanmi Oshakuade
8101 Boat Club Road, Suite 210
Fort Worth, TX 76179-3631

PC Liquidations
140 Stockton St
Jacksonville, FL 32204-1736

PRI/SMMPP, LLC
10860 N Mavinee Drive
Oro Valley, AZ 85737-9526

(p)PROFESSIONAL IMAGING LLC
ATTN PROFESSIONAL IMAGING
6078 BRIDGEVIEW DR
VENTURA CA 93003-1126

PSI Premier Specialties Inc.
dba Medical Express PSI
8800 Shoal Creek Blvd B
Austin, TX 78757-6818

PWS, Inc.
12020 Garfield Ave
South Gate, CA 90280-7823

Julie Anne Parsons
McCreary Veselka Bragg & Allen PC
PO Box 1269
Round Rock, TX 78680-1269

Parts Town, LLC
27787 Network Place
Chicago, IL 60673-1277

Harrison Pavlasek
Forshey Prostok LLP
777 Main St.
Suite 1550
Fort Worth, TX 76102-5384

Performance Foodservice
524 West 61st Street
Shreveport, LA 71106-2513

Performance Health
28100 Torch Pkwy
Warrenville, IL 60555-4030

PharmScript LLC
PO Box 6042
Somerset, NJ 08875-6042

Pharmacy Unlimited
PO Box 592602
San Antonio, TX 78259-0179

Pitney Bowes
PO Box 371896
Pittsburgh, PA 15250-7896

Pitts Birdsong Fennell & Assc.
12770 Coit Road
Dallas, TX 75251-1456

PointClick Care Technologies INC
Wescom Solutions Inc.
PO Box 674802
Detroit, MI 48267-4802

PointClick Care Technologies Inc.
PO Box 674802
Detroit, MI 48267-4802

Portable Diagnostic Services Inc
3022 Motley Dr
Mesquite, TX 75150-3440

Porter Law Firm
The Porter Law Firm P.C.
3311 Woods Blvd
Tyler, TX 75707-1657

Precision Environmental Services
516 Forest Trail
Argyle, TX 76226-6704

Precision Plumbing Dallas
809 Woodbridge Pkwy
Wylie, TX 75098-7148

Premier Irrigation Services
881 Encino Drive
New Braunfels, TX 78130-6648

Primary Health
PO Box 743571
Atlanta, GA 30374-3571

Primary Health-SMMPP
1661 N Swan Road
Tucson, AZ 85712-4042

ProToCall
303 W Loop 281
Longview, TX 75605-4470

Prospera NPWT, LLC
c/o Dan McCaughey
7606 Claret Avenue
Baton Rouge, LA 70809-1584

Jeff P. Prostok
Forshey Prostok LLP
777 Main Street
Suite 1550
Fort Worth, TX 76102-5384

Purchase Power
Pitney Bowes
1 Elmcroft Road
Stamford, CT 06926-0700

Pye-Barker Fire & Safety, LLC
Katie Franke
PO Box 735358
Dallas, TX 75373-5358

Quality HVAC & Refrigeration LLC
105 Picasso Dr
San Marcos, TX 78666-9518

Quatro Tax LLC
3909 Hulen Street, Suite 100
Forth Worth, TX 76107-7225

Quatro Tax LLC
3909 Hulen Street
Fort Worth, TX 76107-7225

Quatro Tax, LLC
c/o ForsheyProstok, LLP
777 Main Street Suite 1550
Fort Worth, TX 76102-5384

Quintairos, Prieto, Wood and Boyer PA
9300 South Dadeland Blvd, 4th Floor
Miami, FL 33156-2748

Quintairos, Prieto, Wood and Boyer PA
c/o Frank Alvarez, Esq.
1700 Pacific Ave., Suite 4545
Dallas, TX 75201-4641

RC Practitioners, PLLC
Mickey Rizo
4251 FM 2181
Corinth, TX 76210-4219

Radwell International LLC
3401 Ave. E East
Arlington, TX 76011-5234

Alexandria Rahn
Gutnicki LLP
10440 N. Central Expressway
Suite 800
Dallas, TX 75231-2264

RedGuard, LLC
PO Box 733895
Dallas, TX 75373-3895

Reeder Distributors, Inc.
Kimberly McDaniel
PO Box 225264
Dallas, TX 75222-5264

Reinhart Foodservice
524 West 61st Street
Shreveport, LA 71106-2513

Reinhart Foodservice Louisiana, LLC
Kohner Mann and Kailas S.C.
4650 N. Fort Washington Road
Milwaukee, WI 53212-1991

Remarkable Healthcare of Carrollton, LP
4501 Plano Parkway
Carrollton, TX 75010-4971

Replacement Remotes
Rita Pleimann
4945 Reynolda Road
Winston Salem, NC 27106-9643

Reserve Capital Group
100 Overlook Center
Princeton, NJ 08540-7814

Roder Construction Group, LLC
2609 Oak Blossom Drive
McKinney, TX 75071-6776

SERVPRO of Carrollton
3033 Kellway Dr. Suite 124
Carrollton, TX 75006-2505

SNF Receivable Solutions Ann Trimble
PO Box 498950
Cincinnati, OH 45249-8950

SRP Environmental LLC
348 Aero Drive
Shreveport, LA 71107-6704

(p)STERICYCLE INC
2355 WAUKEGAN ROAD
BANNOCKBURN IL 60015-1503

Safe Air Conditioning
1846 E Rosemeade Pkwy
Carrollton, TX 75007-2637

Saltmarsh Cleaveland and Gund
PO Drawer 13207
Pensacola, FL 32591-3207

Sash Healthcare Service
Dr. Shay Maya
5930 Royal Lane, E119
Dallas, TX 75230-3849

Scrubs On Wheels
1730 GATEWAY CT
ELKHART, IN 46514-8217

Searcy & Searcy PC
PO Box 3929
Longview, TX 75606-3929

Sherwin Williams Suite 707460
4229 Midway Road
Carrollton, TX 75007-1956

ShredAmerica Texas LLC
Jason McCray
3831 FM 2181, Suite 103
Corinth, TX 76210-4205

Robert A. Simon
Whitaker Chalk Swindle & Schwartz, PLLC
301 Commerce Street
Suite 3500
Fort Worth, TX 76102-4135

Simple LTC - EZ PBJ
2435 N Central EXPWY
Richardson, TX 75080-2753

Simply Work
PO Box 2172
Neenah, WI 54957-2172

SiteBox Storage
Brandon Devlin
4340 S West St.
Wichita, KS 67217-3816

Smarter Shredding INC
4851 Lyndon B Johnson Fwy
Dallas, TX 75244-6004

Sorrels Law
Randall Sorrels and Tom Omondi
5300 Memorial Drive, Suite 270
Houston, TX 77007-8250

Spectrum
8260 13 009 210 0034
P.O. Box 60074
City Of Industry, CA 91716-0074

Steckler PLLC
12720 Hillcrest rd
Dallas, TX 75230-2035

StripingLot
2630 N. I35E
Carrollton, TX 75007-4404

Summit LTC Management
1320 S. University Drive
Fort Worth, TX 76107-5764

Sweet C Transportation Services
2105 Dorothy Lane
Azle, TX 76020-2034

Szaferman, Lakind, Blumstein & Blader, P.C.
101 Grovers Mill Rd
Lawrenceville, NJ 08648-4706

T.E. HVAC Services, LLC
704 S Hampshire St
Saginaw, TX 76179-2100

(p)TEXAS COMPTROLLER OF PUBLIC ACCOUNTS
REVENUE ACCOUNTING DIV - BANKRUPTCY SECTION
PO BOX 13528
AUSTIN TX 78711-3528

(p)THE PRINCIPAL FINANCIAL GROUP
711 HIGH ST
DES MOINES IA 50392-0001

(p)TIGER SANITATION LLC
ATTN COLLECTIONS
PO BOX 200143
SAN ANTONIO TX 78220-0143

Tamara Bonnet, RHIA
Health Information Consultation Services
2901 Saint Andrews
Richardson, TX 75082-3209

Tarrant County
Linebarger Goggan Blair & Sampson, LLP
C/O John Kendrick Turner
2777 North Stemmons Frwy
Suite 1000
Dallas, TX 75207-2328

Taylor Sudden Service, Inc.
5136 Sun Valley Dr
Fort Worth, TX 76119-6410

Texas Attorney General's Office
Bankruptcy-Collections Division
PO Box 12548
Austin, TX 78711-2548

Texas Master Locksmiths and Security Sol
Stephanie Ewen
3044 Old Denton Rd. Suite 111-186
Carrollton, TX 75007-5016

Texas Radiology Associates
1820 Preston Park Blvd
Plano, TX 75093-3656

Texas Winds Musical Outreach Inc
PO Box 797811
Dallas, TX 75379-7811

Texas Workforce Commission
TEC Building Bankruptcy
101 East 13th Street
Austin TX 78778-0001

Whitney Tharpe
DOJ-USAO
110 N. College
Ste 700
Tyler, TX 75702-7237

The Copier Guy
Mark Winkler
PO Box 542961
Dallas, TX 75354-2961

The County of Denton, Texas
McCreary Veselka Bragg & Allen, P.C.
c/o Julie Anne Parsons
P.O. Box 1269
Round Rock, TX 78680-1269

The County of Denton, Texas
c/o McCreary, Veselka, Bragg & Allen
P.O. Box 1269
Round Rock, TX 78680-1269

The County of Guadalupe, Texas
McCreary, Veselka, Bragg & Allen, P.C.
P.O. Box 1269
Round Rock, TX 78680-1269

The Flying Locksmiths - Fort Worth
4364 Western Center Blvd
Fort Worth, TX 76137-2043

The Hartford
P.O. Box 660916
Dallas, TX 75266-0916

The Messina Law Firm PC
5910 N Central Expressway
Dallas, TX 75206-5165

The PICC Team DFW
4500 Northside Drive
Amarillo, TX 79108-6614

The Sherwin Williams
6420A Denton Hwy
Watauga, TX 76148-2539

Three D Lawn Care LLC
3681 Agnes Circle
Springtown, TX 76082-5781

Time Warner Cable
PO Box 60074
City Of Industry, CA 91716-0074

Time Warner Cable Business
P.O. Box 60074
City of Industry, CA 91716-0074

Titan Air Solutions
Reggie
1923 Golden Heights Rd, Suite 204
Fort Worth, TX 76177-7004

Totalcare Comprehensive Home Health
401 E Front St
Tyler, TX 75702-8250

Trans-Care Medical Transport
PO Box 14274
Fort Worth, TX 76117-0274

Tri-Sate Fleet Management LLC
12621 N Saginaw Blvd
Fort Worth, TX 76179-9472

John Kendrick Turner
Linebarger Goggan Blair & Sampson, LLP
2777 N. Stemmons Freeway
Suite 1000
Dallas, TX 75207-2328

Turner Stone & Company, LLP
attn E. Todd Estes
12700 Park Central Drive suite 1400
Dalals, TX 75251-1507

Turner, Stone & Company LLP
12700 Park Central Drive Suite 1400
Dallas, TX 75251-1507

U.S. Attorney General
Department of Justice
Main Justice Building
10th & Constitution Ave., NW
Washington, DC 20530-0001

U.S. Department of Justice
Tax Division
David G. Adams
717 N. Harwood, Suite 400
Dallas, TX 75201-6506

U.S. Infusion, Inc.
Stoney Mosal
4904 Williams Rd.
Benbrook, TX 76116-8816

U.S. Postal Service
4600 Mark IV Parkway
Fort Worth, TX 76161-9804

UNUM Life Insurance Company of America
RMC
Annamarie Lavigne
Woburn, MA 01888

US Foods, Inc.
Fish License Suite 17108
Dallas, TX 75284-0001

US Trustee
Office of the U.S. Trustee
110 N. College Ave.
Suite 300
Tyler, TX 75702-7231

United Seating & Mobility
P.O. Box 790051
Saint Louis, MO 63179-0051

Unlimited Air Conditioning & Heating
Frank Mariscal
P.O. Box 3711
Dallas, TX 75208-1011

VOHRA Wound Physicians
PO Box 742712
Atlanta, GA 30374-2712

Vanguard Vascular & Vein
7700 Lakeview Parkway
Rowlett, TX 75088-4362

John M. Vardeman
UST Office
110 N. College St., Suite 300
Tyler, TX 75702-7231

Vectra RX LLC
1661 N Swan Road
Tucson, AZ 85712-4042

WC of Texas
PO Box 742695
Cincinnati, OH 45274-2695

Mark A WEISBART (SBRA V)
Subchapter V Trustee
10501 N Central Expy Suite 106
Dallas, TX 75231-2203

WMK, LLC- Mobility Works
4150 Interstate 30
Mesquite, TX 75150-2058

WellSky Corporation
11300 Switzer Road
Overland Park, KS 66210-3665

Wick Phillips Gould & Martin, LLP
3131 McKinney Ave
Dallas, TX 75204-7426

Williamsons AC Contracting
8200 White Settlement Rd
White Settlement, TX 76108-1603

Windstream
P.O. Box 9001013
Louisville, KY 40290-1013

WoundKair Concepts, Inc.
7535 Benbrook Parkway
Benbrook, TX 76126-2127

Zoom Video Communications Inc.
55 Almaden Blvd
San Jose, CA 95113-1685

Zthernet, LLC
600 E. John Carpenter Frwy, Suite 300
Irving, TX 75062-4155

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

ACADIAN AMBULANCE SERVICE INC
ATTN JESSE PROCTOR
P O BOX 98000
LAFAYETTE LA 70509-8000

IPFS CORPORATION
30 MONTGOMERY STREET, SUITE 1000
JERSEY CITY NJ 07302-3836

MIRANDA M WILLIAMS LLC
ATTN MIRANDA M WILLIAMS
7613 PROVIDENCE DR
ROWLETT TX 75089-3905

Medline Industries, Inc.
PO Box 121080
Dallas, TX 75312

Mid South Fire Solutions, LLC
669 Aero Drive
Shreveport, LA 71107-6943

NORTH TEXAS FIRE SYSTEMS LLC
PO BOX 880
SANGER TX 76266-0880

PROFESSIONAL IMAGING LLC
ATTN PROFESSIONAL IMAGING
6078 BRIDGEVIEW DR
VENTURA CA 93003-1126

STERICYCLE INC
2355 WAUKESHA ROAD
BANNOCKBURN IL 60015-1503

TEXAS COMPTROLLER OF PUBLIC ACCOUNTS
REVENUE ACCOUNTING DIV - BANKRUPTCY SECT
PO BOX 13528
AUSTIN TX 78711-3528

THE PRINCIPAL FINANCIAL GROUP
711 HIGH ST
DES MOINES IA 50392-0001

TIGER SANITATION LLC
ATTN COLLECTIONS
PO BOX 200143
SAN ANTONIO TX 78220-0143

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Alleon Capital Partners, LLC
c/o Buffy E. Klein
Busch Blackwell LLP
1900 N. Pearl Street, Suite 1800
Dallas, TX 75201-2467

(d)American Express National Bank
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

(u)Case 24-40605

(d)Complete ERC
3348 Darvany Dr.
Dallas, TX 75220-1616

(d)Direct Energy Business
P.O. Box 660749
Dallas, TX 75266-0749

(d)Engie Resources
P.O. Box 841680
Dallas, TX 75284-1680

(u)United States Department of Health and Hum

(u)KRS Carrollton, LLC

(u)Kilgore Property Management LLC

(d)Lewisville ISD

Linebarger Goggan Blair & Sampson, LLP
c/o John Kendrick Turner
2777 N. Stemmons Freeway Suite 1000
Dallas, TX 75207-2328

(d)Performance Foodservice

524 West 61st street
Shreveport, LA 71106-2513

(d)Pharmacy Unlimited

PO Box 592602
San Antonio, TX 78259-0179

(u)Texas Health and Human Services Commission

(d)The PICC Team DFW

4500 Northside Dr.
Amarillo, TX 79108-6614

(d)Three D Lawn Care LLC

3681 Agnes Circle
Springtown, TX 76082-5781

End of Label Matrix

Mailable recipients 363

Bypassed recipients 15

Total 378

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE:	§	
REMARKABLE HEALTHCARE OF	§	
CARROLLTON, LP <i>et al.</i>	§	Case No. 24-40605
Debtor(s).	§	EXPEDITED HEARING SET
	§	

**ORDER GRANTING MOTION FOR EXPEDITED HEARING
REGARDING:**

- (I) **THIRD MOTION TO (I) APPROVE INTO DEBTOR POSSESSION CREDIT AGREEMENT, (II) GRANT PRIMING LIENS UNDER CODE SEC. 364(D), AND (III) OBTAIN RELATED RELIEF (REGARDING APRIL 19, 2024 PAYROLL) (DOCKET NO. 187) AND**
- (II) **FOURTH MOTION (I) APPROVE INTO DEBTOR POSSESSION CREDIT AGREEMENT, (II) GRANT PRIMING LIENS UNDER CODE SEC. 364(D), AND (III) OBTAIN RELATED RELIEF (REGARDING MAY 3, 2024 PAYROLL) (DOCKET NO. 188)**
-

On this date came on for consideration the above-captioned Motion to Expedite Hearing (Docket No. 189) regarding the above-captioned motions. The Court finds and concludes that sufficient cause exists to set an expedited hearing.

IT IS THEREFORE ORDERED THAT the Court shall conduct an expedited hearing on the above-captioned motions, Docket Nos. 187, 188, on the date set in this order and/or on the docket of this case.

KRS Carrollton LLC et al. is response for service this Order and/or providing notice.

Dated: _____

THE HONORABLE BRENDA. T. RHOADES
UNITED STATES BANKRUPTCY JUDGE